

# EXHIBIT M

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

ARJUN VASAN,  
Plaintiff and Counter-Defendant,  
v.  
CHECKMATE.COM, INC.,  
(dba "Checkmate")  
Defendant and Counterclaimant.

**Case No.:** CV-00765-MEMF-JPR

Hon. Maame Ewusi-Mensah Frimpong

**PLAINTIFF'S SECOND SET OF REQUESTS  
FOR ADMISSION TO DEFENDANT  
CHECKMATE.COM, INC.; "November 14  
Separation Meeting"**

Complaint Filed: January 28, 2025

**TO DEFENDANT CHECKMATE.COM, INC. AND ITS COUNSEL OF RECORD:**

Pursuant to Federal Rule of Civil Procedure 36, Plaintiff propounds the following Requests for Admission ("RFAs"). Each admission is to be answered in writing, under oath, within **30 days** after service unless the parties stipulate or the Court orders otherwise.

**I. DEFINITIONS**

1. **"Plaintiff"** means Arjun Vasan.
2. **"Defendant" / "Checkmate"** means Checkmate.com, Inc., including its officers, agents, employees and counsel.

3. **“Separation Meeting”** means the Zoom meeting held on **November 14, 2024, at 8:00 a.m.**, which was recorded. *This label is a neutral shorthand for identification only and does not concede or assume any legal characterization or consequence.*
4. **“Announcement Meeting”** means the internal Voice team meeting scheduled for and held at **9:00 a.m. on November 14, 2024**, after the Separation Meeting.
5. **“Competitor Emails”** means the emails referenced by Mr. Agarwal during the Separation Meeting as the basis for alleging Plaintiff communicated with a competitor and violated his non-solicitation agreement. *This label is for identification only; it does not concede that the emails constitute “solicitation,” wrongdoing, or any legal conclusion.*
6. **“Zoom Transcript”** means the transcript of the Separation Meeting (Exhibit H).
7. **“Fathom Recording”** means the third-party Fathom.video recording/summary associated with the November 14 Meeting, as linked in the record.
8. **“Post-Call Segment”** means the portion of the Separation Meeting **after Plaintiff left**, during which the Zoom recording continued. *(See “Zoom Transcript,” Ex. H.)*
9. **“Agarwal Declaration”** refers to the declaration filed as ECF 18-4 (and its attached email exhibits). **Paragraph 26** describes the Separation Meeting and ¶ **25** the Competitor Emails.
10. **“Nessler Declaration”** refers to the declaration of Robert Nessler describing that he and others were informed that Plaintiff was terminated on November 14. See ECF 81-2.

## II. INSTRUCTIONS

- A. Answer each RFA separately and fully as required by Rule 36. If Checkmate cannot admit or deny, state the reasons and describe the reasonable inquiry made.
- B. If an RFA is admitted in part and denied in part, specify which part is admitted and which is denied.
- C. These RFAs are continuing; if Checkmate later obtain information requiring amendment, promptly serve amended answers under Rule 26(e).

## III. REQUESTS FOR ADMISSION

**Event / who / recording**

1. Admit that prior to the **Separation Meeting**, Plaintiff had offered to return part-time and had sent Checkmate medical certification clearing him to work on a limited schedule.
2. Admit that **Vishal Agarwal** scheduled the **Separation Meeting**, and by email, purported that the purpose of the meeting was to discuss Plaintiff's offer to return to work.
3. Admit that the **Separation Meeting** started at approximately **8:00 a.m. Pacific Time**.
4. Admit that Checkmate personnel, including **Vishal Agarwal, Michael Bell, and Amy Brown**, attended the **Separation Meeting**.
5. Admit that the **Separation Meeting** was recorded.
6. Admit that the recording referenced in ¶ 3 continued after Plaintiff disconnected.

**Fathom / artifacts**

7. Admit that the **Separation Meeting** recording was processed by **Fathom.video**, which generated a transcript and/or summary.
8. Admit that the **Fathom.video link**, video and summary remain live at the web address:  
<https://fathom.video/share/j-ZStSqCq9Z7mRriEnHs6R7dxy7Aqixp?tab=summary>

**Medical-leave context**

9. Admit that, prior to the **Separation Meeting**, Checkmate was informed by email that **Plaintiff was in a medical facility with limited access to devices**.
10. Admit that Plaintiff started the call by describing his improving health, eagerness to return to work and ongoing assistance to the Voice team while he was recovering.

**Statements during the Separation Meeting**

11. Admit that during the **Separation Meeting**, **Mr. Agarwal stated to Plaintiff** words to the effect: **"you are being terminated with immediate effect, right now, right this second."**
12. Admit that **Mr. Agarwal repeated words to that effect at least two times** during the **Separation Meeting**.

1 13. Admit that, during the November 14 Meeting, **Mr. Agarwal referenced turning the matter**  
2 **over to a lawyer** if a settlement could not be reached, or words to that effect.

3 14. Admit that Plaintiff attempted to argue that he had only sent the **Competitor Emails** because  
4 his bonus had not been paid, and felt he was being “screwed”, or words to that effect.

5 15. Admit that **prior to Mr. Agarwal stating that Plaintiff was being terminated**, Plaintiff had  
6 been discussing his return to work, and ongoing assistance to the Voice team.

7 16. Admit that Mr. Agarwal **indicated the termination decision was final**.

8 17. Admit that, during the **Separation Meeting**, **Mr. Bell referenced involving a lawyer**, or  
9 words to that effect.

10 18. Admit that, during the **Separation Meeting**, **Mr. Agarwal referenced the Lunchbox**  
11 **Emails** as the basis for alleging that Plaintiff had violated the non-solicitation clause.

12 19. Admit that during the **Separation Meeting**, Mr. Agarwal stated words to the effect that **the**  
13 **only reason** for Plaintiff’s termination were the **Competitor Emails**.

14  
15 **Sole basis / no reports / no investigation (time-anchored)**

16 20. Admit that, **as of the start** of the **Separation Meeting**, the only basis known to Checkmate  
17 for alleging solicitation by Plaintiff were the **Competitor Emails**.

18 21. Admit that, **as of the start** of the **Separation Meeting**, Checkmate had not received any  
19 written or oral report from any person asserting that Plaintiff asked them to leave Checkmate.

20 22. Admit that, **as of the start** of the **Separation Meeting**, Checkmate had not conducted any  
21 investigation into whether Plaintiff asked any employee to leave Checkmate.

22  
23 **Post-Call Segment**

24 23. Admit that, during the **Post-Call Segment**, **Mr. Agarwal stated** words to the effect: “*he’s*  
25 *on medical leave; in [t]his condition; we fired him for something that’s not true.*”

26 24. Admit that, during the **Post-Call Segment**, participants discussed off-boarding steps for  
27 Plaintiff.  
28

1 25. Admit that Mr. Bell stated during the **Post-Call Segment**, that he had been preparing other  
2 team members for Plaintiff no longer working at Checkmate.

3 26. Admit that Mr. Bell had not seen the **Competitor Emails** himself prior to the meeting.

4 27. Admit that, during the **Post-Call Segment**, participants discussed scheduling a 9:00 a.m.  
5 Pacific meeting that same morning to inform the team (“Announcement Meeting”).  
6

7 **Announcement Meeting**

8 28. Admit that the **Announcement Meeting** was indeed scheduled for 9:00 a.m. Pacific on  
9 November 14, 2024.

10 29. Admit that the **Announcement Meeting** indeed occurred at the scheduled time.

11 30. Admit that, at the **Announcement Meeting**, Checkmate personnel informed Voice team  
12 members that Plaintiff was terminated.

13 31. Admit that the reason given at the **Announcement Meeting** for Plaintiff’s termination was  
14 solicitation of employees.

15 32. Admit that attendees at the **Announcement Meeting** included **Robert Nessler** and at least  
16 two or more of the following: **Christopher Lam, Isamu Aoki, Paul Garcia, and Pranav**  
17 **Sood**, as well as **one or both of Mr. Agarwal and Mr. Bell**.

18 33. Admit that one or more team members present at the **Announcement Meeting** were  
19 questioned about the solicitation allegations, but only after Plaintiff’s termination.

20 34. Admit that **no Voice team member reported any such solicitation** of them by Plaintiff.  
21

22 **Artifacts / access**

23 35. Admit that the **Zoom and Fathom.video accounts** used for the **Separation Meeting** were  
24 managed or controlled by Checkmate or its agents.

25 36. Admit that the **Separation Meeting** is the same Zoom meeting described in the Agarwal  
26 Declaration at ¶ 26 of ECF No. 18-4.

27 37. Admit that the **Announcement Meeting** is the 9:00AM meeting described by Robert Nessler  
28 in the **Nessler Declaration** (ECF No. 81-2 at 7, ¶¶ 7-8 )

1 38. Admit that the **Competitor Emails** are the same as those described in the **Agarwal**

2 **Declaration at ¶ 25** and exhibited at **p. 78-80 of ECF No. 18-4.**

3 39. Admit that Checkmate **possesses no other such emails or communications.**

4 40. Admit that, during the **Separation Meeting**, **Plaintiff did not state that he was resigning.**

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18 **VERIFICATION (for Responding Party)**

19 I am authorized to respond to these Requests for Admission on behalf of Defendant. I have  
20 read the foregoing responses and, based on a reasonable inquiry, the matters stated therein are true  
21 and correct to the best of my knowledge and belief.

22  
23  
24 Dated: \_\_\_\_\_ Signature: \_\_\_\_\_

25  
26 Name: \_\_\_\_\_ Title: \_\_\_\_\_

27  
28 for Defendant Checkmate.com, Inc.

**CERTIFICATE OF SERVICE (Rule 5(b)(2)(E))**

I certify that on **August 17, 2025**, I served **Plaintiff's Second Set** of Requests for Admission to Defendant Checkmate.com, Inc. (Set Two — "November 14 Separation Meeting") by sending a true and correct copy via email to counsel of record at the addresses below:

Rebecca Makitalo  
K&L Gates LLP  
[rebecca.makitalo@klgates.com](mailto:rebecca.makitalo@klgates.com)

Ryan Q. Keech  
K&L Gates LLP  
[ryan.keeceh@klgates.com](mailto:ryan.keeceh@klgates.com)

Stacey Chiu  
K&L Gates LLP  
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10100 Santa Monica Blvd., 8th Floor  
Los Angeles, California 90067  
Phone: 310.552.5070

This Service was made by email pursuant to Fed. R. Civ. P. 5(b)(2)(E) (consent).

*I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.*

/s/ **Arjun Vasani**

Dated: **August 17, 2025**

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Arjun Vasani  
Plaintiff In Pro Per



1 Ryan Q. Keech (SBN 280306)  
Ryan.Keech@klgates.com  
2 Stacey Chiu (SBN 321345)  
Stacey.Chiu@klgates.com  
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8  
9 *Attorneys for Defendant and Counterclaimant*  
*CHECKMATE.COM INC.*

10  
11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13

14 ARJUN VASAN,

15 Plaintiff,

16 v.

17  
18 CHECKMATE.COM, INC.,

19 Defendant.  
20

21 CHECKMATE.COM, INC.,

22 Counterclaim-Plaintiff,

23 v.

24  
25 ARJUN VASAN,

26 Counterclaim-  
27 Defendant.  
28

Case No. 2:25-CV-00765-MEMF-JPR

Magistrate Judge Jean P. Rosenbluth

**CHECKMATE.COM, INC.'S  
RESPONSES TO PLAINTIFF  
ARJUN VASAN'S SECOND SET  
OF REQUESTS FOR  
ADMISSIONS**

Complaint Filed: January 28, 2025  
Amended Complaint Filed: February  
21, 2025

1 PROPOUNDING PARTY: PLAINTIFF ARJUN VASAN  
2 RESPONDING PARTY: DEFENDANT CHECKMATE.COM, INC.  
3 SET NO.: TWO (2)

4 Defendant Checkmate.com, Inc. (“Defendant” or “Checkmate”) hereby  
5 responds to Plaintiff Arjun Vasan (“Plaintiff” or “Vasan”)’s Second Set of Requests  
6 for Admission (the “Requests”), as follows:

7 **PRELIMINARY STATEMENT**

8 Checkmate’s investigation of the facts relating to this case is still ongoing. As  
9 such, Checkmate has not completed its investigation, has not completed discovery,  
10 and has not completed preparation for trial. All of the answers contained herein are  
11 based upon the information presently available, and specifically known, to  
12 Checkmate. It is anticipated that further discovery and further independent  
13 investigation will supply additional facts which may clarify and add meaning to facts  
14 presently known, as well as establish new factual matters, all of which may lead to  
15 substantial addition to, changes in, and variations from the responses set forth herein.  
16 The following responses are given without prejudice to Checkmate’s right to produce  
17 evidence of any subsequently discovered fact or facts that Checkmate may later recall.

18 The responses contained herein are made in a good faith effort to supply as  
19 much factual information as is presently known, but should in no way be to the  
20 prejudice of these parties in relationship to further discovery, research, or analysis.  
21 Checkmate reserves the right to alter, supplement, amend, or otherwise modify these  
22 responses in any way and at any time, including at or during trial, in light of facts  
23 revealed to them through discovery, further investigation, or further legal analysis.  
24 Checkmate also reserves the right to amend or supplement these responses with any  
25 information that has been inadvertently or unintentionally omitted and/or to introduce  
26 such information into evidence at the time of hearing or trial.

27 Checkmate makes these responses to the Requests subject to, and without  
28 waiving in any way any objections as to competence, relevance, materiality, propriety,

1 and admissibility, and any and all other objections and grounds which would require  
2 the exclusion of any statement herein if the Requests were asked of, or any statements  
3 contained were made by, a witness present and testifying in Court, all of which  
4 objections and grounds are reserved and may be interposed at time of trial.

5 **GENERAL OBJECTIONS**

6 1. To the extent the Requests call for confidential communications between  
7 Checkmate and any of its/his/her attorneys, or information that is otherwise covered  
8 by the attorney-client privilege, the work-product doctrine, or any other right or  
9 privilege recognized by California or federal law, Checkmate generally objects to the  
10 Requests, and each request contained therein.

11 2. Checkmate objects to the Requests, and each request contained therein,  
12 to the extent that they seek information protected by the California or United States  
13 constitutions, California or federal statutes or case law that establish a right of privacy  
14 and forbid the discovery and dissemination of confidential, sensitive and financial  
15 information. Checkmate will not reveal such information where doing so would  
16 violate the privacy rights of Checkmate or of third parties.

17 3. Checkmate objects to the Requests, and each request contained therein,  
18 to the extent that they seek information that is not relevant and/or material to the  
19 subject matter of this litigation or are not reasonably calculated to lead to the  
20 discovery of admissible evidence.

21 4. Checkmate objects to the Requests, and each request contained therein,  
22 insofar as they are repetitive, redundant or overlapping.

23 5. Checkmate objects to the Requests, and each request contained therein,  
24 to the extent that they are unduly burdensome, oppressive, annoying or harassing.

25 6. Checkmate objects to the Requests, and each request contained therein,  
26 to the extent that they are vague and ambiguous, compound, confusing, unintelligible,  
27 unclear and amenable to different meanings, understandings or interpretations.  
28 Checkmate is responding to each Request as it interprets and understands that Request

1 with respect to the issues framed in connection with this litigation. If Checkmate  
2 asserts an interpretation of any part of a Request that differs from the understanding  
3 of Checkmate, Checkmate reserves the right to supplement, amend, or modify their  
4 responses or objections.

5 7. Checkmate objects to the Requests, and to each request contained  
6 therein, to the extent they are unlimited in time or seek information beyond the time-  
7 frame relevant to this litigation on the grounds that they are overbroad and unduly  
8 burdensome and seek information that is irrelevant to the subject matter of this  
9 litigation.

10 8. Checkmate objects to the Requests, and each request contained therein,  
11 to the extent they seek to impose duties or obligations different from, additional to, or  
12 otherwise beyond those required by the Federal Rules of Civil Procedure.

13 9. Checkmate objects to the Requests, and each request therein, to the  
14 extent they seek information that is equally available to or within Plaintiff's  
15 possession, custody or control on the grounds that such Requests are unduly  
16 burdensome and oppressive.

17 10. Checkmate objects to the definition of "You" / "Defendant" in that it is  
18 vague, ambiguous, overbroad, and reflects an attempt to circumvent Federal Rule of  
19 Civil Procedure 45. It is also objectionable to the extent it intrudes upon the  
20 attorney/client privilege, work product, and/or other applicable privileges.

21 11. Checkmate objects to the definition of "Separation Meeting" in that it is  
22 vague, ambiguous, overbroad, and unduly burdensome.

23 12. Checkmate objects to the definition of "Announcement Meeting" in that  
24 it is vague, ambiguous, overbroad, and unduly burdensome.

25 13. Checkmate objects to the definition of "Zoom Transcript" in that it is  
26 vague, ambiguous, and overbroad, and unduly burdensome.

27 14. Checkmate objects to the definition of "Fathom Recording" in that it is  
28 vague, ambiguous, and overbroad, and unduly burdensome.

1 15. Checkmate objects to the definition of “Post-Call Segment” in that it is  
2 vague, ambiguous, and overbroad, and unduly burdensome.

3 16. The foregoing objections are incorporated by reference into each of the  
4 specific responses made herein. Notwithstanding the specific responses to any of the  
5 Requests, Checkmate does not waive any of the general or specific objections made  
6 herein.

7 17. Subject to and without waiving the foregoing General Objections,  
8 Checkmate responds to Vasan’s Second Set of Requests for Admissions as follows:

9 **RESPONSES TO REQUESTS FOR ADMISSION**

10 **REQUEST FOR ADMISSION NO. 1:**

11 Admit that prior to the **Separation Meeting**, Plaintiff had offered to return part-  
12 time and had sent Checkmate medical certification clearing him to work on a limited  
13 schedule.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

15 Responding Party hereby incorporates the General Objections as though fully  
16 set forth herein. Responding Party objects to this Request on the grounds that the term  
17 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and  
18 unduly burdensome. Responding Party further objects that the terms “clearing him”  
19 and “limited schedule” are vague, ambiguous, and overbroad. Responding Party  
20 further objects that the Request is compound, containing multiple distinct inquiries  
21 within a single request, which is improper under the applicable Rules.

22 **REQUEST FOR ADMISSION NO. 2:**

23 Admit that **Vishal Agarwal** scheduled the **Separation Meeting**, and by email,  
24 purported that the purpose of the meeting was to discuss Plaintiff’s offer to return to  
25 work.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

27 Responding Party hereby incorporates the General Objections as though fully  
28 set forth herein. Responding Party objects to this Request on the grounds that the term

1 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and  
2 unduly burdensome. Responding Party further objects that the terms “purported that  
3 the purpose” are vague, ambiguous, and overbroad. Responding Party further objects  
4 that the Request is compound, containing multiple distinct inquiries within a single  
5 request, which is improper under the applicable Rules.

6 **REQUEST FOR ADMISSION NO. 3:**

7 Admit that the **Separation Meeting** started at approximately **8:00 a.m. Pacific**  
8 **Time.**

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

10 Responding Party hereby incorporates the General Objections as though fully  
11 set forth herein. Responding Party objects to this Request on the grounds that the term  
12 “Separation Meeting,” as defined by Plaintiff is vague, ambiguous, overbroad, and  
13 unduly burdensome.

14 Without waiving the foregoing objections, Responding Party responds as  
15 follows: Checkmate admits that Mike Bell, Vishal Agarwal, Amy Brown, and  
16 Plaintiff attended a recorded meeting via Zoom on November 14, 2024, beginning at  
17 8:00 a.m. Pacific Time, and otherwise denies the remainder of the Request.

18 **REQUEST FOR ADMISSION NO. 4:**

19 Admit that Checkmate personnel, including **Vishal Agarwal, Michael Bell,**  
20 **and Amy Brown,** attended the **Separation Meeting.**

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

22 Responding Party hereby incorporates the General Objections as though fully  
23 set forth herein. Responding Party objects to this Request on the grounds that the term  
24 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and  
25 unduly burdensome. Responding Party further objects that the term “Checkmate  
26 personnel” are vague, ambiguous, and overbroad.

27 Without waiving the foregoing objections, Responding Party responds as  
28 follows: Checkmate admits that Mike Bell, Vishal Agarwal, Amy Brown, and

1 Plaintiff attended a recorded meeting via Zoom on November 14, 2024, beginning at  
2 8:00 a.m. Pacific Time, and otherwise denies the remainder of the Request.

3 **REQUEST FOR ADMISSION NO. 5:**

4 Admit that the **Separation Meeting was recorded.**

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

6 Responding Party hereby incorporates the General Objections as though fully  
7 set forth herein. Responding Party objects to this Request on the grounds that the term  
8 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and  
9 unduly burdensome.

10 Without waiving the foregoing objections, Responding Party responds as  
11 follows: Checkmate admits that Mike Bell, Vishal Agarwal, Amy Brown, and  
12 Plaintiff attended a recorded meeting via Zoom on November 14, 2024, beginning at  
13 8:00 a.m. Pacific Time, and otherwise denies the remainder of the Request.

14 **REQUEST FOR ADMISSION NO. 6:**

15 Admit that the recording referenced in ¶ 3 continued after Plaintiff  
16 disconnected.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

18 Responding Party hereby incorporates the General Objections as though fully  
19 set forth herein. Responding Party objects to this Request on the grounds that the  
20 terms “the recording” and “referenced in ¶ 3” are so vague, ambiguous, overbroad,  
21 and unduly burdensome as to render the Request unintelligible. Responding Party  
22 further objects to this Request in that the term “referenced” is vague, ambiguous, and  
23 overbroad. To determine whether a document or thing “references” the facts recited  
24 in the Request requires interpretation, and it is unclear from the Request in what  
25 manner the information may “reference” such facts. Responding Party further objects  
26 that the Request is not self-contained as it incorporates another pleading by reference,  
27 which is improper under the applicable Rules.

28 Without waiving the foregoing objections, Responding Party responds as



1 follows: Given that the Request is unintelligible, Responding Party lacks the ability  
2 to admit or deny it, and on that basis denies the Request.

3 **REQUEST FOR ADMISSION NO. 7:**

4 Admit that the **Separation Meeting** recording was processed by  
5 **Fathom.video**, which generated a transcript and/or summary.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

7 Responding Party hereby incorporates the General Objections as though fully  
8 set forth herein. Responding Party objects to this Request on the grounds that the term  
9 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and  
10 unduly burdensome. Responding Party further objects that the terms “was processed  
11 by” are vague, ambiguous, and overbroad. Responding Party further objects that the  
12 Request is compound, containing multiple distinct inquiries within a single request,  
13 which is improper under the applicable Rules.

14 **REQUEST FOR ADMISSION NO. 8:**

15 Admit that the **Fathom.video link**, video and summary remain live at the web  
16 address: <https://fathom.video/share/j-ZStSqCq9Z7mRriEnHs6R7dxy7Aqixp?tab=summary>.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

18 Responding Party hereby incorporates the General Objections as though fully  
19 set forth herein. Responding Party objects to this Request on the grounds that the  
20 terms “remain live” are vague, ambiguous, and overbroad. Responding Party further  
21 objects that the Request is compound, containing multiple distinct inquiries within a  
22 single request, which is improper under the applicable Rules.

23 **REQUEST FOR ADMISSION NO. 9:**

24 Admit that, prior to the **Separation Meeting**, Checkmate was informed by  
25 email that **Plaintiff was in a medical facility with limited access to devices**.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

27 Responding Party hereby incorporates the General Objections as though fully  
28 set forth herein. Responding Party objects to this Request on the grounds that the term



1 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and  
2 unduly burdensome. Responding Party further objects that the terms “medical  
3 facility,” “limited access,” and “devices” are vague, ambiguous, and overbroad.  
4 Responding Party further objects to this Request on the grounds that the terms “prior  
5 to” are vague, ambiguous, and overbroad as to the relevant time period.

6 Without waiving the foregoing objections, Responding Party responds as  
7 follows: Without waiving the foregoing objections, Responding Party responds as  
8 follows: Checkmate admits that on or around October 23, 2024, Plaintiff requested  
9 medical leave and was approved by Checkmate to take personal medical leave that  
10 would consist of two weeks of paid time off and otherwise denies the remainder of  
11 the Request.

12 **REQUEST FOR ADMISSION NO. 10:**

13 Admit that Plaintiff started the call by describing his improving health,  
14 eagerness to return to work and ongoing assistance to the Voice team while he was  
15 recovering.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

17 Responding Party hereby incorporates the General Objections as though fully  
18 set forth herein. Responding Party objects to this Request on the grounds that the  
19 terms “started the call,” “improving health,” “eagerness to return to work,” “ongoing  
20 assistance,” “Voice team,” and “recovering” are vague, ambiguous, and overbroad.  
21 Responding Party further objects that the Request seeks information that is neither  
22 relevant to the subject matter of the action nor reasonably calculated to lead to the  
23 discovery of admissible evidence. Responding Party further objects that the Request  
24 is compound, containing multiple distinct inquiries within a single request, which is  
25 improper under the applicable Rules.

26 **REQUEST FOR ADMISSION NO. 11:**

27 Admit that during the **Separation Meeting, Mr. Agarwal stated to Plaintiff**  
28 words to the effect: **“you are being terminated with immediate effect, right now,**

1 **right this second.”**

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

3 Responding Party hereby incorporates the General Objections as though fully  
4 set forth herein. Responding Party objects to this Request on the grounds that the term  
5 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and  
6 unduly burdensome. Responding Party further objects in that the terms “words to the  
7 effect” are vague, ambiguous, and overbroad. Responding Party further objects that  
8 the Request calls for a legal conclusion rather than a factual response.

9 Without waiving the foregoing objections, Responding Party responds as  
10 follows: Deny.

11 **REQUEST FOR ADMISSION NO. 12:**

12 Admit that **Mr. Agarwal repeated words to that effect at least two times**  
13 **during the Separation Meeting.**

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

15 Responding Party hereby incorporates the General Objections as though fully  
16 set forth herein. Responding Party objects to this Request on the grounds that the term  
17 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and  
18 unduly burdensome. Responding Party further objects in that the terms “repeated”  
19 and “words to that effect” are so vague, ambiguous, and overbroad as to render the  
20 Request unintelligible.

21 Without waiving the foregoing objections, Responding Party responds as  
22 follows: Given that the Request is unintelligible, Responding Party lacks the ability  
23 to admit or deny it, and on that basis denies the Request.

24 **REQUEST FOR ADMISSION NO. 13:**

25 Admit that, during the November 14 Meeting, **Mr. Agarwal referenced**  
26 **turning the matter over to a lawyer** if a settlement could not be reached, or words  
27 to that effect.

28 **///**

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

2 Responding Party hereby incorporates the General Objections as though fully  
3 set forth herein. Responding Party objects to this Request on the grounds that the  
4 terms “November 14 Meeting,” “turning the matter over,” and “words to that effect”  
5 are vague, ambiguous, and overbroad. Responding Party further objects to this  
6 Request in that the term “referenced” is vague, ambiguous, and overbroad. To  
7 determine whether a document or thing “references” the facts recited in the Request  
8 requires interpretation, and it is unclear from the Request in what manner the  
9 information may “reference” such facts. Responding Party further objects that the  
10 Request is compound, containing multiple distinct inquiries within a single request,  
11 which is improper under the applicable Rules.

12 **REQUEST FOR ADMISSION NO. 14:**

13 Admit that Plaintiff attempted to argue that he had only sent the **Competitor**  
14 **Emails** because his bonus had not been paid, and felt he was being “screwed”, or  
15 words to that effect.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

17 Responding Party hereby incorporates the General Objections as though fully  
18 set forth herein. Responding Party objects to this Request on the grounds that the term  
19 “Competitor Emails,” as defined by Plaintiff, is vague, ambiguous, overbroad, and  
20 unduly burdensome. Responding Party further objects that the terms “attempted to  
21 argue,” “being ‘screwed’,” and “words to that effect” are vague, ambiguous, and  
22 overbroad. Responding Party further objects that the Request is compound, containing  
23 multiple distinct inquiries within a single request, which is improper under the  
24 applicable Rules.

25 **REQUEST FOR ADMISSION NO. 15:**

26 Admit that **prior to Mr. Agarwal stating that Plaintiff was being**  
27 **terminated**, Plaintiff had been discussing his return to work, and ongoing assistance  
28 to the Voice team.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

2 Responding Party hereby incorporates the General Objections as though fully  
3 set forth herein. Responding Party objects to this Request on the grounds that the  
4 terms “being terminated,” “return to work,” “ongoing assistance” and “Voice team”  
5 are vague, ambiguous, and overbroad. Responding Party further objects to this  
6 Request on the grounds that the terms “prior to” are vague, ambiguous, and overbroad  
7 as to the relevant time period. Responding Party further objects that the Request calls  
8 for a legal conclusion rather than a factual response. Responding Party further objects  
9 that the Request is compound, containing multiple distinct inquiries within a single  
10 request, which is improper under the applicable Rules.

11 **REQUEST FOR ADMISSION NO. 16:**

12 Admit that Mr. Agarwal **indicated the termination decision was final.**

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

14 Responding Party hereby incorporates the General Objections as though fully  
15 set forth herein. Responding Party objects to this Request on the grounds that the  
16 terms “termination decision” and “final” are vague, ambiguous, and overbroad.  
17 Responding Party further objects that the Request calls for a legal conclusion rather  
18 than a factual response.

19 Without waiving the foregoing objections, Responding Party responds as  
20 follows: Deny.

21 **REQUEST FOR ADMISSION NO. 17:**

22 Admit that, during the **Separation Meeting, Mr. Bell referenced involving a**  
23 **lawyer**, or words to that effect.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

25 Responding Party hereby incorporates the General Objections as though fully  
26 set forth herein. Responding Party objects to this Request on the grounds that the term  
27 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and  
28 unduly burdensome. Responding Party further objects that the terms “involving a

1 lawyer” and “words to that effect” are vague, ambiguous, and overbroad. Responding  
2 Party further objects to this Request in that the term “referenced” is vague, ambiguous,  
3 and overbroad. To determine whether a document or thing “references” the facts  
4 recited in the Request requires interpretation, and it is unclear from the Request in  
5 what manner the information may “reference” such facts. Responding Party further  
6 objects that the Request is compound, containing multiple distinct inquiries within a  
7 single request, which is improper under the applicable Rules.

8 **REQUEST FOR ADMISSION NO. 18:**

9 Admit that, during the Separation Meeting, **Mr. Agarwal referenced the**  
10 **Lunchbox Emails** as the basis for alleging that Plaintiff had violated the non-  
11 solicitation clause.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

13 Responding Party hereby incorporates the General Objections as though fully  
14 set forth herein. Responding Party objects to this Request on the grounds that the term  
15 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and  
16 unduly burdensome. Responding Party further objects that the terms “Lunchbox  
17 Emails” are so vague, ambiguous, and overbroad as to render the Request  
18 unintelligible. Responding Party further objects that the terms “as the basis for  
19 alleging” and “non-solicitation clause” are vague, ambiguous, and overbroad.  
20 Responding Party further objects to this Request in that the term “referenced” is  
21 vague, ambiguous, and overbroad. To determine whether a document or thing  
22 “references” the facts recited in the Request requires interpretation, and it is unclear  
23 from the Request in what manner the information may “reference” such facts.  
24 Responding Party further objects that the Request calls for a legal conclusion rather  
25 than a factual response. Responding Party further objects that the Request is  
26 compound, containing multiple distinct inquiries within a single request, which is  
27 improper under the applicable Rules.

28 Without waiving the foregoing objections, Responding Party responds as

1 follows: Given that the Request is unintelligible, Responding Party lacks the ability  
2 to admit or deny it, and on that basis denies the Request.

3 **REQUEST FOR ADMISSION NO. 19:**

4 Admit that during the **Separation Meeting**, Mr. Agarwal stated words to the  
5 effect that **the only reason** for Plaintiff's termination were the **Competitor Emails**.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

7 Responding Party hereby incorporates the General Objections as though fully  
8 set forth herein. Responding Party objects to this Request on the grounds that the  
9 terms "Separation Meeting" and "Competitor Emails," as defined by Plaintiff, are  
10 vague, ambiguous, overbroad, and unduly burdensome. Responding Party further  
11 objects that the terms "words to the effect" are vague, ambiguous, and overbroad.  
12 Responding Party further objects that the Request calls for a legal conclusion rather  
13 than a factual response.

14 Without waiving the foregoing objections, Responding Party responds as  
15 follows: Deny.

16 **REQUEST FOR ADMISSION NO. 20:**

17 Admit that, **as of the start** of the **Separation Meeting**, the only basis known  
18 to Checkmate for alleging solicitation by Plaintiff were the **Competitor Emails**.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

20 Responding Party hereby incorporates the General Objections as though fully  
21 set forth herein. Responding Party objects to this Request on the grounds that the  
22 terms "Separation Meeting" and "Competitor Emails," as defined by Plaintiff, are  
23 vague, ambiguous, overbroad, and unduly burdensome. Responding Party further  
24 objects that the terms "as of the start of" and "the only basis known" are vague,  
25 ambiguous, and overbroad. Responding Party further objects that the Request calls  
26 for a legal conclusion rather than a factual response.

27 Without waiving the foregoing objections, Responding Party responds as  
28 follows: Deny.

1 **REQUEST FOR ADMISSION NO. 21:**

2 Admit that, **as of the start** of the **Separation Meeting**, Checkmate had not  
3 received any written or oral report from any person asserting that Plaintiff asked them  
4 to leave Checkmate.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

6 Responding Party hereby incorporates the General Objections as though fully  
7 set forth herein. Responding Party objects to this Request on the grounds that the term  
8 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and  
9 unduly burdensome. Responding Party further objects that the terms “as of the start  
10 of,” “any written or oral report,” “any person,” and “asked them to leave” are vague,  
11 ambiguous, and overbroad. Responding Party further objects that the Request is  
12 compound, containing multiple distinct inquiries within a single request, which is  
13 improper under the applicable Rules.

14 **REQUEST FOR ADMISSION NO. 22:**

15 Admit that, **as of the start** of the **Separation Meeting**, Checkmate had not  
16 conducted any investigation into whether Plaintiff asked any employee to leave  
17 Checkmate.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

19 Responding Party hereby incorporates the General Objections as though fully  
20 set forth herein. Responding Party objects to this Request on the grounds that the term  
21 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and  
22 unduly burdensome. Responding Party further objects that the terms “as of the start  
23 of,” “any investigation,” “any employee,” and “to leave Checkmate” are vague,  
24 ambiguous, and overbroad.

25 Without waiving the foregoing objections, Responding Party responds as  
26 follows: Deny.

27 **REQUEST FOR ADMISSION NO. 23:**

28 Admit that, during the **Post-Call Segment**, **Mr. Agarwal** stated words to the



1 effect: “*he’s on medical leave; in [t]his condition; we fired him for something that’s*  
2 *not true.*”

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

4 Responding Party hereby incorporates the General Objections as though fully  
5 set forth herein. Responding Party objects to this Request on the grounds that the term  
6 “Post-Call Segment,” as defined by Plaintiff, is vague, ambiguous, overbroad, and  
7 unduly burdensome. Responding Party further objects that the terms “words to the  
8 effect” are vague, ambiguous, and overbroad.

9 Without waiving the foregoing objections, Responding Party responds as  
10 follows: Deny.

11 **REQUEST FOR ADMISSION NO. 24:**

12 Admit that, during the **Post-Call Segment**, participants discussed off-boarding  
13 steps for Plaintiff.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

15 Responding Party hereby incorporates the General Objections as though fully  
16 set forth herein. Responding Party objects to this Request on the grounds that the term  
17 “Post-Call Segment,” as defined by Plaintiff, is vague, ambiguous, overbroad, and  
18 unduly burdensome. Responding Party further objects that the terms “participants”  
19 and “off-boarding steps” are vague, ambiguous, and overbroad.

20 Without waiving the foregoing objections, Responding Party responds as  
21 follows: Deny.

22 **REQUEST FOR ADMISSION NO. 25:**

23 Admit that Mr. Bell stated during the **Post-Call Segment**, that he had been  
24 preparing other team members for Plaintiff no longer working at Checkmate.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

26 Responding Party hereby incorporates the General Objections as though fully  
27 set forth herein. Responding Party objects to this Request on the grounds that the term  
28 “Post-Call Segment,” as defined by Plaintiff, is vague, ambiguous, overbroad, and



1 unduly burdensome. Responding Party further objects that the terms “had been  
2 preparing,” “other team members,” and “no longer working” are vague, ambiguous,  
3 and overbroad.

4 Without waiving the foregoing objections, Responding Party responds as  
5 follows: Deny.

6 **REQUEST FOR ADMISSION NO. 26:**

7 Admit that Mr. Bell had not seen the **Competitor Emails** himself prior to the  
8 meeting.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

10 Responding Party hereby incorporates the General Objections as though fully  
11 set forth herein. Responding Party objects to this Request on the grounds that the term  
12 “Competitor Emails,” as defined by Plaintiff, is vague, ambiguous, overbroad, and  
13 unduly burdensome. Responding Party further objects that the terms “prior to” are  
14 vague, ambiguous, and overbroad as to the relevant time period.

15 Without waiving the foregoing objections, Responding Party responds as  
16 follows: Checkmate admits that while Vasan was on leave, Mr. Agarwal learned  
17 through an industry contact that Vasan had contacted a competitor of Checkmate to  
18 discuss the possibility of joining the competitor’s company, bringing two engineers  
19 from Checkmate with him, and otherwise denies the remainder of the Request.

20 **REQUEST FOR ADMISSION NO. 27:**

21 Admit that, during the **Post-Call Segment**, participants discussed scheduling a  
22 9:00 a.m. Pacific meeting that same morning to inform the team (“Announcement  
23 Meeting”).

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

25 Responding Party hereby incorporates the General Objections as though fully  
26 set forth herein. Responding Party objects to this Request on the grounds that the term  
27 “Post-Call Segment,” as defined by Plaintiff, is vague, ambiguous, overbroad, and  
28 unduly burdensome. Responding Party further objects that the terms “participants,”

1 “discussed scheduling,” “that same morning,” and “inform the team” are so vague,  
2 ambiguous, and overbroad as to render the Request unintelligible.

3 Without waiving the foregoing objections, Responding Party responds as  
4 follows: Given that the Request is unintelligible, Responding Party lacks the ability  
5 to admit or deny it, and on that basis denies the Request.

6 **REQUEST FOR ADMISSION NO. 28:**

7 Admit that the **Announcement Meeting** was indeed scheduled for 9:00 a.m.  
8 Pacific on November 14, 2024.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

10 Responding Party hereby incorporates the General Objections as though fully  
11 set forth herein. Responding Party objects to this Request on the grounds that the term  
12 “Announcement Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad,  
13 and unduly burdensome. Responding Party further objects that the terms “indeed  
14 scheduled” are vague, ambiguous, and overbroad.

15 Without waiving the foregoing objections, Responding Party responds as  
16 follows: Deny.

17 **REQUEST FOR ADMISSION NO. 29:**

18 Admit that the **Announcement Meeting** indeed occurred at the scheduled time.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

20 Responding Party hereby incorporates the General Objections as though fully  
21 set forth herein. Responding Party objects to this Request on the grounds that the term  
22 “Announcement Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad,  
23 and unduly burdensome. Responding Party further objects that the terms “indeed  
24 occurred” and “scheduled time” are vague, ambiguous, and overbroad.

25 Without waiving the foregoing objections, Responding Party responds as  
26 follows: Deny.

27 **REQUEST FOR ADMISSION NO. 30:**

28 Admit that, at the **Announcement Meeting**, Checkmate personnel informed

1 Voice team members that Plaintiff was terminated.

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

3         Responding Party hereby incorporates the General Objections as though fully  
4 set forth herein. Responding Party objects to this Request on the grounds that the term  
5 “Announcement Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad,  
6 and unduly burdensome. Responding Party further objects that the terms “Checkmate  
7 personnel” and “Voice team members” are vague, ambiguous, and overbroad.  
8 Responding Party further objects that the Request calls for a legal conclusion rather  
9 than a factual response.

10         Without waiving the foregoing objections, Responding Party responds as  
11 follows: Deny.

12 **REQUEST FOR ADMISSION NO. 31:**

13         Admit that the reason given at the **Announcement Meeting** for Plaintiff’s  
14 termination was solicitation of employees.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 31:**

16         Responding Party hereby incorporates the General Objections as though fully  
17 set forth herein. Responding Party objects to this Request on the grounds that the term  
18 “Announcement Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad,  
19 and unduly burdensome. Responding Party further objects that the terms “the reason  
20 given” are vague, ambiguous, and overbroad. Responding Party further objects that  
21 the Request calls for a legal conclusion rather than a factual response.

22         Without waiving the foregoing objections, Responding Party responds as  
23 follows: Deny.

24 **REQUEST FOR ADMISSION NO. 32:**

25         Admit that attendees at the **Announcement Meeting** included **Robert Nessler**  
26 and at least two or more of the following: **Christopher Lam, Isamu Aoki, Paul**  
27 **Garcia, and Pranav Sood**, as well as **one or both of Mr. Agarwal and Mr. Bell.**

28 ///

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 32:**

2 Responding Party hereby incorporates the General Objections as though fully  
3 set forth herein. Responding Party objects to this Request on the grounds that the term  
4 “Announcement Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad,  
5 and unduly burdensome. Responding Party further objects that the terms “attendees,”  
6 “at least two or more of the following,” and “as well as one or both” are vague,  
7 ambiguous, and overbroad. Responding Party further objects that the Request is  
8 compound, containing multiple distinct inquiries within a single request, which is  
9 improper under the applicable Rules.

10 **REQUEST FOR ADMISSION NO. 33:**

11 Admit that one or more team members present at the **Announcement Meeting**  
12 were questioned about the solicitation allegations, but only after Plaintiff’s  
13 termination.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 33:**

15 Responding Party hereby incorporates the General Objections as though fully  
16 set forth herein. Responding Party objects to this Request on the grounds that the term  
17 “Announcement Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad,  
18 and unduly burdensome. Responding Party further objects that the terms “one or more  
19 team members” and “the solicitation allegations” are vague, ambiguous, and  
20 overbroad. Responding Party further objects that the Request calls for a legal  
21 conclusion rather than a factual response. Responding Party further objects to this  
22 Request on the grounds that the terms “only after” are vague, ambiguous, and  
23 overbroad as to the relevant time period. Responding Party further objects that the  
24 Request is compound, containing multiple distinct inquiries within a single request,  
25 which is improper under the applicable Rules.

26 **REQUEST FOR ADMISSION NO. 34:**

27 Admit that **no Voice team member reported any such solicitation** of them  
28 by Plaintiff.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 34:**

2 Responding Party hereby incorporates the General Objections as though fully  
3 set forth herein. Responding Party objects to this Request on the grounds that the  
4 terms “Voice team member” and “any such solicitation” are vague, ambiguous, and  
5 overbroad. Responding Party further objects that the Request calls for a legal  
6 conclusion rather than a factual response.

7 Without waiving the foregoing objections, Responding Party responds as  
8 follows: Deny.

9 **REQUEST FOR ADMISSION NO. 35:**

10 Admit that the Zoom and Fathom.video accounts used for the **Separation**  
11 **Meeting** were managed or controlled by Checkmate or its agents.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 35:**

13 Responding Party hereby incorporates the General Objections as though fully  
14 set forth herein. Responding Party objects to this Request on the grounds that the  
15 term “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad,  
16 and unduly burdensome. Responding Party further objects that the terms “accounts  
17 used,” “managed or controlled,” and “its agents” are vague, ambiguous, and  
18 overbroad. Responding Party further objects that the Request calls for a legal  
19 conclusion rather than a factual response. Responding Party further objects that the  
20 Request is compound, containing multiple distinct inquiries within a single request,  
21 which is improper under the applicable Rules.

22 **REQUEST FOR ADMISSION NO. 36:**

23 Admit that the **Separation Meeting** is the same Zoom meeting described in the  
24 Agarwal Declaration at ¶ 26 of ECF No. 18-4.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 36:**

26 Responding Party hereby incorporates the General Objections as though fully  
27 set forth herein. Responding Party objects to this Request on the grounds that the term  
28 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and

1 unduly burdensome. Responding Party further objects that the terms “the same Zoom  
2 meeting” are vague, ambiguous, and overbroad. Responding Party further objects that  
3 the Request is not self-contained as it incorporates another pleading by reference,  
4 which is improper under the applicable Rules. Responding Party further objects that  
5 the Request is compound, containing multiple distinct inquiries within a single  
6 request, which is improper under the applicable Rules.

7 **REQUEST FOR ADMISSION NO. 37:**

8 Admit that the **Announcement Meeting** is the 9:00AM meeting described by  
9 Robert Nessler in the **Nessler Declaration (ECF No. 81-2 at 7, ¶¶ 7-8 )**.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 37:**

11 Responding Party hereby incorporates the General Objections as though fully  
12 set forth herein. Responding Party objects to this Request on the grounds that the term  
13 “Announcement Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad,  
14 and unduly burdensome. Responding Party further objects that the Request is not self-  
15 contained as it incorporates another pleading by reference, which is improper under  
16 the applicable Rules. Responding Party further objects that the Request is compound,  
17 containing multiple distinct inquiries within a single request, which is improper under  
18 the applicable Rules.

19 **REQUEST FOR ADMISSION NO. 38:**

20 Admit that the **Competitor Emails** are the same as those described in the  
21 **Agarwal Declaration at ¶ 25** and exhibited at **p. 78-80 of ECF No. 18-4**.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 38:**

23 Responding Party hereby incorporates the General Objections as though fully  
24 set forth herein. Responding Party objects to this Request on the grounds that the term  
25 “Competitor Emails,” as defined by Plaintiff, is vague, ambiguous, overbroad, and  
26 unduly burdensome. Responding Party further objects that the terms “are the same as  
27 those described” are vague, ambiguous, and overbroad. Responding Party further  
28 objects that the Request is not self-contained as it incorporates another pleading by

1 reference, which is improper under the applicable Rules. Responding Party further  
2 objects that the Request is compound, containing multiple distinct inquiries within a  
3 single request, which is improper under the applicable Rules.

4 **REQUEST FOR ADMISSION NO. 39:**

5 Admit that Checkmate **possesses no other such emails or communications.**

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 39:**

7 Responding Party hereby incorporates the General Objections as though fully  
8 set forth herein. Responding Party objects to this Request on the grounds that the  
9 terms “no other such emails or communications” are so vague, ambiguous, and  
10 overbroad as to render the Request unintelligible. Responding Party further objects  
11 that the Request is compound, containing multiple distinct inquiries within a single  
12 request, which is improper under the applicable Rules.

13 **REQUEST FOR ADMISSION NO. 40:**

14 Admit that, during the **Separation Meeting, Plaintiff did not state that he**  
15 **was resigning.**

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 40:**

17 Responding Party hereby incorporates the General Objections as though fully  
18 set forth herein. Responding Party objects to this Request on the grounds that the term  
19 “Separation Meeting,” as defined by Plaintiff, is vague, ambiguous, overbroad, and  
20 unduly burdensome. Responding Party further objects that the Request calls for a legal  
21 conclusion rather than a factual response.

22 ///

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1 Without waiving the foregoing objections, Responding Party responds as  
2 follows: Checkmate admits that on November 14, 2024, at 9:57 a.m. PST, Vasan  
3 resigned via email and otherwise denies the remainder of the Request.

4  
5 Date: September 16, 2025

K&L GATES LLP

6  
7 

8 Ryan Q. Keech (SBN 280306)  
9 Stacey Chiu (SBN 321345)  
10 Rebecca I. Makitalo (SBN 330258)  
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16  
17 *Attorneys for Defendant and Counter-*  
18 *Claimant CHECKMATE.COM INC.*  
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**PROOF OF SERVICE**

Case No. 2:25-CV-00765-MEMF-JPR

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is K&L GATES LLP, 10100 Santa Monica Boulevard, Eighth Floor, Los Angeles, California 90067.

On **September 16, 2025**, I served the document(s) described as:

**CHECKMATE.COM, INC.'S RESPONSES TO PLAINTIFF ARJUN VASAN'S SECOND SET  
OF REQUESTS FOR ADMISSIONS**

on the person or person(s) below, as follows:

Arjun Vasan  
12615 193rd Street  
Cerritos, CA 90703  
Email: [arjun.vasan@gmail.com](mailto:arjun.vasan@gmail.com)  
Telephone: 562-900-6541

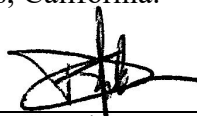
*Plaintiff Pro Se*

The documents were served by the following means:

- ☐ **BY U.S. MAIL:** I caused such envelope(s) to be deposited in the mail at Los Angeles, California with postage thereon fully prepaid to the office of the addressee(s) as indicated above. I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day, with postage fully prepaid, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.
- ☒ **BY ELECTRONIC SERVICE:** by transmitting a true copy of the foregoing document(s) to the email-addresses set forth as stated above.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on **September 16, 2025**, at Los Angeles, California.

  
\_\_\_\_\_  
Dyana Estrada